UNITED STATES DISTRICT COURT DISTRICT OF NEW HAMPSHIRE

)	
ANDRE BISASOR,)	
Plaintiff,)	
)	
VS.)	
)	
CRAIG S. DONAIS, RUSSELL F.)	Case No. 1:23-cv-374-JL
HILLIARD, DONAIS LAW OFFICES)	Judge Joseph N. Laplante
PLLC, UPTON AND HATFIELD LLP,)	
and MARY K. DONAIS,)	
Defendants.)	
)	

JOINT MOTION TO EXTEND DEADLINE TO FILE MOTIONS PREVIOUSLY FILED IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS BY THIRTY DAYS

NOW COME the Parties, jointly, and respectfully request this Court extend, by thirty days, the Procedural Order in Transferred Cases (Doc. no. 63), such that any motion previously filed and not ruled on in the United States District Court for the District of Massachusetts must be filed in this Court by Wednesday, September 27, 2023. As grounds therefor, the Parties state that there were several pending motions upon transfer to this Court, and the additional time will allow the Parties to fully consider whether new or additional issues should be addressed or modified given the transfer to this Court.

This request is not intended to delay or prejudice the Court or any party, and if additional time is granted may allow for the outstanding issues to be presented in a streamlined, more efficient manner.

WHEREFORE, the Parties respectfully request that this Court extend the deadline to file motions that were pending in state court by thirty days (from August 28, 2023 to September 27, 2023), along with any other relief the Court deems proper.

Respectfully submitted,

The Plaintiff, ANDRE BISASOR, Pro se,

/s/ Andre Bisasor

Andre Bisasor, pro se quickquantum@aol.com 679 Washington Street Suite #8-206 Attleboro, MA 02703 T: (781) 492-5675 The Defendants, CRAIG S. DONAIS, MARY K. DONAIS, and DONAIS LAW OFFICES, PLLC, By their attorneys,

/s/ Edwin F. Landers, Jr.

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The Defendants, RUSSELL F. HILLIARD and UPTON & HATFIELD, LLP, By their attorneys,

/s/ Daniel R. Sonneborn

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Dated: August 23, 2023

CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of this document to be served via electronic filing or email on all counsel of record or pro se parties on August 23, 2023.

<u>/s/ Daniel R. Sonneborn</u> Daniel R. Sonneborn